



Frequently Asked Questions (FAQs) for Human Resources Professionals

- 1. QUESTION:** What are the two types of Internships?
ANSWER: There is an Internship that has a Not-to-Exceed (NTE) date, also known as an Intern NTE. There is also an Internship without a NTE date, also known as a career Intern.
- 2. QUESTION:** The OPM Transition and Implementation Guidance states that all Interns (those with and without a NTE date) are eligible to be noncompetitively converted to a permanent or term position. Will there be any direction on differentiating between the type of appointment, either on the position description or on the organizational chart?
ANSWER: Interns appointed with a NTE date have a different Nature of Action (NOA) code from those that are career Interns. As well, time limited Intern positions should be included on organizational charts and the NTE date stated in the Participant Agreement.
- 3. QUESTION:** When do you anticipate the MOU will be signed?
ANSWER: The MOU was signed in December 2012 and is posted on the SHRO SharePoint site.
- 4. QUESTION:** With regard to the change in certificate requirements, we have questions about whether some of the commonly used certificates qualify. (e.g., Is Eppley Institute accredited? They are affiliated with IU, but are they specifically accredited?) Is someone working with those institutions to advise them of the changes?
ANSWER: We are unsure if parks/offices have reached out to the learning institutions with which they have a partnership. HR offices and managers should work closely together to do so. If SHRO's have a question about a specific program and/or institution they can contact FASER for assistance.
- 5. QUESTION:** Can an Intern NTE be placed in to position with a higher FPL (e.g. WG-3 with a WG-5 FPL)?
ANSWER: No, an Intern NTE can only be hired into a single grade position. They will need to apply to an internal (or external) announcement if they want to be promoted to a higher graded position. The promotion is processed as a conversion.
- 6. QUESTION:** Can Intern appointments with NTE dates be extended? If so, how long?
ANSWER: Yes, they can be extended in increments of 1 year or less as long as the Intern continues to meet Pathway's program requirements.

Please keep in mind that Intern NTE appointments can no longer be extended after the student completes his/her degree requirements. Appointments can only be extended if the student is still eligible to participate in the Internship program.

- 7. QUESTION:** Can an Intern make changes to his/her academic degree/certificate type and/or specialty. If so, does this require a change in the Pathways participant agreement?

ANSWER: Pathways Interns who wish to make a change in their type of degree/certificate or degree/certificate specialty must discuss this change with his/her supervisor, as it may prompt a change in the Pathways participant agreement.

-If the supervisor and student have communicated and agreed upon the change in the participant agreement, the agreement can be changed to reflect the new academic degree/certificate completion requirements.

-If the supervisor and student have communicated and the supervisor does not agree with a change to the participant agreement to accommodate the change in the type of degree/certificate or degree/certificate specialty, then the student will need to be separated or converting in accordance with the terms of the original Pathways participant agreement.

Supervisors should consider how changes to the participant agreement correspond to their overall workforce planning efforts and must coordinate changes to the Pathways participant agreement with their Servicing Human Resources Offices (SHROs). The Intern must, at all times, be enrolled or accepted for enrollment into a qualifying degree/certificate program. Thus, acceptance for enrollment into a new academic program must be before completion of current academic degree/certificate requirements.

- 8. QUESTION:** For Recent Graduates, is this understanding correct? The maximum grade upon initial appointment is the GS-09, and they must be in a career ladder position; so, the career ladder could extend beyond the GS-09?

ANSWER: Yes, in this instance, the career ladder FPL must go beyond the GS-09. Recent Graduate initial appointments cannot be made at the FPL. There are certain instances where the initial appointment can be above the GS-09.

Agencies may appoint Recent Graduates with degrees in the STEM fields (science, technology, engineering or math) at the GS-11 (or equivalent) level if they possess a Ph.D. or equivalent degree from a qualifying institution directly related to the position being filled.

Agencies may make initial appointments to scientific and professional research positions at the GS-11 (or equivalent) level for which the classification and qualification criteria for research positions apply, if the candidate possesses a master's degree or equivalent graduate degree directly related to the position the agency is seeking to fill. If the candidate has a Ph.D. or equivalent degree directly related to the position the agency is filling, the appointment may be made at the GS-12 level (or equivalent).

- 9. QUESTION:** Are we reporting to OPM on our workforce planning efforts specifically or just their outcome, i.e., the number of students we can hire and the number we can convert if they successfully complete the program?

ANSWER: We do not specifically have to state our workforce plan. However, all agencies participating in the Pathways Programs must provide the following information to OPM:

☐ The occupations for which the Pathways Programs will be used to fill entry-level positions during the coming year;

- The percentage of positions to be filled under the Internship, Recent Graduates and PMF Programs, respectively, expected during the coming year; and
- For the previous year:
 - The number of participants initially appointed under each Pathways Program;
 - The percentage of the agency's overall hires made from each Pathways Program;
 - The number of Pathways Program participants converted to the competitive service for each Pathways Program; and
 - The number of Pathways Program participants who were separated for each Pathways Program.

There is a sample reporting sheet in Appendix G of the OPM Transition and Implementation Guidance.

10. QUESTION: When recruiting under the Pathways Internship Program, can we limit the area of consideration for internal and external announcements?

ANSWER: We can limit the area of consideration for external candidates to a specific location (i.e. city or region), however we cannot limit the area of consideration to a specific learning institution. The applicant would need to live or attend school in the area of consideration. If a veteran from outside of the area of consideration applies we must accept his/her application.

We can limit the area of consideration for internal candidates to NPS employees; we cannot limit internal announcements to a specific location or learning institution.

11. QUESTION: Can we limit the area of consideration for recent graduate positions?

ANSWER: No, we cannot limit the area of consideration for recent graduate positions to internal candidates nor by geographic location. All recent graduate positions must be announced externally to all eligible candidates.

12. QUESTION: Regarding the program oversight, the regulations state OPM will be looking at, "Agency engagement in sound workforce planning to ensure that an adequate number of permanent positions will be available to which Pathways Participants who successfully complete their Programs can be converted." What is an adequate number? The regulations permit us to make term appointments, do those count? Do we have to track those term appointments to see how many we eventually convert?

ANSWER: At this time, it is unknown what OPM will consider an adequate number. According to the OPM Transition and Implementation Guidance, reporting should include Pathways participants that are converted to the competitive service; this would include those converted to term appointments. There does not appear to be a requirement to track beyond the term appointment.

13. QUESTION: Regarding program oversight, the regulations state OPM will be looking at, "Agency record in using the Pathways Program as a supplement to competitive examining, rather than as a substitute for it." What does this mean in terms of numbers?

ANSWER: At this time, OPM has not specified a specific number or percentage. We anticipate that OPM is looking at our submission of recruitment for the Pathways Program and how close we get to our expected target based on our workforce planning efforts.

14. QUESTION: When applying Veterans' Preference to the Pathways Program, do the Veterans have to also be students or recent graduates, or can any Veteran apply for a Pathways' announcement?

ANSWER: Yes, Veterans must be students or recent graduates as well as meet all Pathways' eligibility requirements.

15. QUESTION: Can a student approaching completion of his/her education requirements apply for an Internship position?

ANSWER: As long as the student meets the Pathways Internship eligibility requirements, they can apply for the position. However, the applicant must still be a student (or accepted for enrollment) during the rating/referral process and at the point in which he/she enters on duty. It is a good business practice to place a statement/item in the vacancy announcement and/or assessment questionnaire explaining this to potential student applicants.

16. QUESTION: Do permanent positions have to be held for any employees signing the Pathways Agreement?

ANSWER: Although it is not required to convert an Intern or Recent Graduate to a competitive position, OPM will be monitoring our use of the Pathways programs. So we must ensure that we are trying to provide adequate positions as determined by a workforce planning process.

17. QUESTION: Do positions have to be advertised as dedicated positions to the Pathways program?

ANSWER: When advertising positions to be filled through Pathways, we must state this on the vacancy announcement. This does not prohibit the use of other types of vacancy announcements (i.e. DEU or MP); however, remember that the OPM reporting requirements include a section on the expected percentage of hires made using Pathways. In some instances it may be counterproductive to use multiple recruitment efforts for a position.

18. QUESTION: I would really like to understand what benefit(s) the new Pathways Programs offer the Park as compared to the existing SCEP/STEP program or normal recruitment--why would the park choose to participate in this program?

ANSWER: Pathways offers parks the opportunity to target recruitment towards recent graduates as well as current students. Although there are additional requirements when compared with SCEP and STEP, it is still an excepted service authority that provides flexibilities outside of the competitive process and it provides better visibility of positions than did SCEP and STEP. Requiring public notice means that students and recent graduates will know where potential jobs are located.

19. QUESTION: Can more clarification be given about which Pathways Interns can be noncompetitively converted to term or permanent positions?

ANSWER: All Interns (Interns NTE and Career Interns) under the Pathways Program are eligible for conversion to term or permanent competitive appointments according to OPM's regulations. For new Interns, the opportunity for conversion must be stated in the vacancy announcement.

Former STEPs and SCEPs that were transitioned into Pathways Internships do not need to apply to a vacancy announcement to be noncompetitively converted to a term or permanent position.

All opportunities for conversion must be clearly stated in the Participant Agreement (for both new interns and former STEPs and SCEPs). Keep in mind that the Intern NTE is not normally hired with the intent to convert. Intern NTEs are hired to complete temporary and/or seasonal projects. Also, agencies should remember they must report positions, series, grades, etc., they expect to fill under each Pathways Program. Offices should maintain documentation on why an Intern with a NTE is noncompetitively converted to a term or permanent position.

20. QUESTION: When recruiting for Pathways Internship and Recent Graduate positions do we have to place all vacancy announcements on USAJOBS?

ANSWER: All vacancies open to candidates outside of NPS must be placed on USAJOBS.

When recruiting from current NPS student employees, vacancies only need to be placed on InsideNPS via USA Staffing's "Exclusive Posting" method. Announcements with this option selected, do not appear on USAJOBS or Intranet Web sites. You must replace the Xs in the following URL with the USAJOBS control number assigned when the announcement is released to USAJOBS (<http://www.usajobs.gov/GetJob/ViewDetails/xxxxxxx>). Post the complete URL on InsideNPS for eligible applicants so they can access the announcement and apply.

21. QUESTION: If the student's work schedule changes, is a new participant agreement necessary?

ANSWER: It is common for students to work full-time schedules in the summer then go to part-time schedules during the school year. Changes in a student's work schedule are initiated by the manager, and require a change in the participant agreement. It is also an option to have the student sign off on the initial Participant Agreement which states the different work schedules he/she will have throughout the program

22. QUESTION: If an Intern is unable to be placed into his/her targeted permanent or term position can he/she be noncompetitively converted to another position?

ANSWER: Yes, an Intern can be converted to any position to which he/she qualifies.

23. QUESTION: Do Interns NTE have a 120 day grace period in which to be converted to a term or permanent position?

ANSWER: Similar to a Career Intern, an Intern NTE is eligible for the 120 day conversion grace period after completion of academic requirements if they are in a position that has been marked for conversion. Again, instances of converting Temporary Interns should be rare and must have a justification in the student's case file.

24. QUESTION: Can Pathways Interns and Recent Graduates be noncompetitively convert to career/career-conditional appointment upon completion of his/her term appointment?

ANSWER: Recent Graduates, Career Interns and Interns NTE may be noncompetitively converted to a term appointment and subsequently be noncompetitive converted to a career/career-condition appointment upon completion of a 4 year term position. This only applies to the term appointment immediately following the Intern's noncompetitive conversion to the competitive service. If the Participant moves to another term position, they will no longer be eligible for noncompetitive conversion into a career/career-conditional appointment.

25. QUESTION: Is there a minimum number of days that a vacancy announcement should be open?

ANSWER: The vacancy should be open for a period of at least 5 calendar days. Periods of less than 5 calendar days must be documented in the case file to show the examining office's rationale for using a shorter notice period.

26. QUESTION: Do we have to apply Administrative Careers with America (ACWA) to the Intern and Recent Graduate occupations, which are two graded interval occupations with a FPL of GS-9 and above, though they are excepted service appointments?

ANSWER: We are not required to use ACWA testing for Internships under Pathways. We must use ACWA testing for Recent Graduate positions under Pathways. Testing will be used for those positions/series covered by ACWA and will be done during the initial application

phase similar to other ACWA positions announced under Delegated Examining (DE) procedures.

27. QUESTION: Do any provisions exist that will allow bureaus to noncompetitively convert a temporary Intern to a Career Intern?

ANSWER: No, the temporary Intern will need to apply to the Career Intern vacancy announcement via the InsideNPS announcement.